

EXHIBIT 6

CONFIDENTIAL – SUBJECT TO PROTECTIVE ORDER

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

**IN RE: NATIONAL PRESCRIPTION
OPIATE LITIGATION**

This document relates to:

TRACK ONE CASES

MDL No. 2804

Hon. Dan Aaron Polster

**CVS INDIANA, L.L.C.’S AND CVS RX SERVICES, INC.’S AMENDED OBJECTIONS
AND RESPONSES TO INTERROGATORIES NO. 7, 12, 14, 15, 17, 19, AND 22 - 29 OF
PLAINTIFFS’ FIRST SET OF INTERROGATORIES**

Pursuant to Rules 26 and 33 of the Federal Rules of Civil Procedure, CVS Indiana, L.L.C. (“CVS Indiana”) and CVS Rx Services, Inc. (“CVS Rx Services”) (together, the “CVS Distributors”) serve these Amended Objections and Responses to Interrogatories No. 7, 12, 14, 15, 17, 19, and 22 - 29 of Plaintiffs’ First Set of Interrogatories (the “Interrogatories”).

RESERVATION OF RIGHTS

1. The Interrogatories were served on CVS Health Corporation (“CVS Health”), and CVS Health served objections to the Interrogatories on June 18, 2018. Subsequently, on June 20, 2018, the Court granted Plaintiffs’ Unopposed Motion to Dismiss CVS Health and to Add CVS Indiana and CVS Rx Services. Accordingly, those entities are serving these Amended Objections and Responses. CVS Health preserves, and does not waive, its objections to the Interrogatories, and the CVS Distributors hereby adopt and incorporate by reference CVS Health’s June 18, 2018, objections, other than to the extent modified herein.

2. These Amended Objections and Responses are made without waiving, or intending to waive, (i) any objections as to the competency, relevancy, materiality, privilege, or

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CVS Distributors object to providing information for this time period to the extent that it is unduly burdensome to identify, locate, gather, or produce or to the extent that it is not reasonably accessible.

2. The CVS Distributors object to the instruction that all ESI be produced in its native form. The CVS Distributors will produce ESI in response to the Interrogatories in accordance with the ESI Protocol in Case Management Order No. 3 (Dkt. No. 443).

SPECIFIC RESPONSES AND OBJECTIONS

The CVS Distributors object and responds to the Interrogatories as follows:

INTERROGATORY NO. 7: Please Identify all industry associations or other organizations that provided education, information, services or had any involvement with the use, safety, efficacy, production, marketing, sale, dispensing or distribution of Opioid and/or Opioid Products that You are or were a member of, or to which You provided financial or other support, from 1990 to present. Additionally, Identify what if any positions Your employees, officers, or directors have held with any such organizations from January 1, 1990 to present.

AMENDED RESPONSE: The CVS Distributors hereby incorporate their General Objections and Objections to the Definitions and Instructions in their entirety into this response. The CVS Distributors object to this Interrogatory on the grounds that it is overly broad, unduly burdensome, and not proportional, and to the extent it exceeds the scope of Discovery Ruling Nos. 2, 3, and 8. The CVS Distributors also object to this Interrogatory on the ground that it seeks information that is not relevant to any claim or defense in the Track One cases. The CVS Distributors further object to this Interrogatory on the ground that it is vague and ambiguous, insofar as it seeks information about “all industry associations or other organizations that provided information, services or had any involvement with the use efficacy, production,

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marketing, sale, dispensing or distribution of Opioid and/or Opioid Products that You are or were a member of, or to which You provided financial or other support.”

Subject to and without waiving the foregoing objections, the CVS Distributors respond as follows. The CVS Distributors were not members of any trade associations. Caremark Rx Inc. was an affiliate member of Healthcare Distribution Alliance (“HDA”), or its predecessor, prior to its acquisition by CVS Corporation in or around 2008. Since that time, the CVS Distributors’ direct or indirect parent corporation has maintained that affiliate membership, but has not held any positions within HDA.

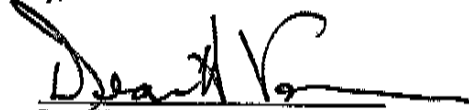
INTERROGATORY NO. 12: Please Identify the date and location of each DEA meeting, training, informational or educational session, or briefing provided to You by the Diversion Control Division, or any other DEA employee(s), related to the distribution and/or dispensing of Controlled Substances, and Identify all Persons who were present for each meeting, training, informational or educational session and/or briefing.

AMENDED RESPONSE: The CVS Distributors hereby incorporate their General Objections and Objections to the Definitions and Instructions in their entirety into this response. The CVS Distributors object to this Interrogatory on the grounds that it is overly broad, unduly burdensome, and not proportional, and to the extent it exceeds the scope of Discovery Ruling Nos. 2, 3, and 8. The CVS Distributors also object to this Interrogatory on the ground that it seeks information that is not relevant to any claim or defense in the Track One cases. The CVS Distributors further object to this Interrogatory on the ground that it is vague and ambiguous insofar as it seeks information about any “meeting, information or educational session, or briefing ... related to the distribution and/or dispensing of Controlled Substances.”

VERIFICATION

I have reviewed CVS Indiana, L.L.C.'s and CVS Rx Services, Inc.'s Amended Objections and Responses to Interrogatories No. 7, 12, 14, 15, 17, 19, and 22 - 29 of Plaintiffs' First Set of Interrogatories. The factual information provided in the Amended Responses is true and correct to the best of my knowledge, information, and belief. To the extent that the Amended Responses contain factual information that is not based on my personal knowledge, I am relying on information provided by others with relevant knowledge for the truthfulness and accuracy of the Amended Responses. Subject to these limitations, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief as of this date.

Executed this ___ day of January, 2019.



Dean Vanelli
Senior Director, Supply Chain and Operations Support